REMARKS

Entry of this Amendment is proper because it does not raise any new issues requiring further search by the Examiner, narrows the issues on appeal, and is believed to place the present application in condition for immediate allowance.

Claims 1 and 3-37 are all the claims presently pending in the application.

Claims 26-32, 36, and 37 are withdrawn from consideration as being directed to non-elected species of the invention.

While Applicants believe that claims 3, 5, 7, 8, 11, and 12 are clear and definite, to speed prosecution, these claims have been amended to define more clearly the features of the claims invention, thereby overcoming the rejection under 35 U.S.C. § 112, second paragraph, set forth below.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 1, 3-16, and 25 stand rejected under 35 U.S.C. § 112, first paragraph, and claims 1, 3-16, and 18 stand rejected under 35 U.S.C. § 112, second paragraph.

Claims 1, 3-25, and 33-35 stand rejected under U.S.C. § 102(b) as being anticipated by Boyce et al., Special Edition Using Microsoft Office 97, pages 185-199 and 1017-1031, © 1997 (hereinafter "Boyce").

These rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention is directed to a method of reconciling component variables with container variables in a document.

In an illustrative, non-limiting embodiment as defined by independent claim 1, a method of reconciling component variables with container variables in a document, includes identifying component variables in a component, for each of the component variables, determining if there is a container variable in the container that refers to a same domain concept, if an identification is determined, associating the component variable in the component with the container variable in the container, and identifying a link expression of the component variable, and determining whether the link expression can be identified with an element in a domain model of the document.

Another exemplary embodiment, as defined by independent claim 17, relates to a method of automatically reconciling component variables with container variables in a document.

In another exemplary embodiment, as defined by independent claim 18, a method of interactively reconciling component variables with container variables in a document, includes displaying a component variable next to a representation of an element in a domain model of the document, identifying an association between the component variable and the element in the domain model, and matching the element of the domain model interactively by a user.

In another exemplary embodiment, as defined by independent claim 19, a system for reconciling component variables with container variables in a document relative to a domain model includes a container including a plurality of container variables, a component having a plurality of component variables in the document, and a reconciler for mapping container variables in the container, with component variables in the component.

In another exemplary embodiment, as defined by independent claim 33, a system for reconciling component variables with container variables in a document includes means for identifying component variables in a component, means for determining, for each of the component variables, if there is a container variable in the container that refers to a same domain concept, means, if an identification is determined, for associating the component variable in the component with the container variable in the container, means for identifying a link expression of said component variable, and means for determining whether the link expression can be identified with an element in a domain model of the document.

In another exemplary embodiment, as defined by independent claim 34, a signal-bearing medium tangibly embodying a program of machine readable instructions executable by a digital processing apparatus to perform a method of reconciling component variables with container variables in a document that is somewhat similar to the independent claims set forth above.

In another exemplary embodiment, as defined by independent claim 35, a signal-bearing medium tangibly embodying a program of machine readable instructions executable by a digital processing apparatus to perform a method of interactively reconciling component variables with container variables in a document that is somewhat similar to the independent claims mentioned above, including displaying a component variable next to a representation of an element in a domain model of the document.

In conventional document assembly systems, importation of document components is typically based on fixed criteria which presents problems for complex documents. For example, a particular clause may be reused throughout a document, and it may be integrated within a larger assembly of document components which is referred to as a "container" or "container assembly". There must be links between the container assembly and the document component

being imported during document assembly, and both items may contain variables which may refer to the same domain concepts (e.g., see specification at page 3, line 20 to page 4, line 5).

However, maintaining consistency between theses variables once the document component (source component) has been imported presents problems unless these variables representing the same concepts are somehow linked to one another. Hitherto the present invention, such a solution has not been provided and hence these problems have been prevalent (e.g., see specification at page 4, lines 6-10).

Instead, with the conventional systems and methods, there are simply container variables and components (e.g., see specification at page 5, lines 9-10).

In conventional systems, the component (independent of its content) that structures the variables together is not independent of the value assignment. As a result, no manual linking of these concepts is provided, and thus there is minimal (if any) flexibility and/or reusability of the components since the components are not generally applicable or generic (e.g., see specification at page 6, lines 1-5).

Further, there may be several different components in the document that all refer to the same concepts (e.g., the company's address is repeated in different places throughout the document). However, since in conventional systems the variables in the different components are not linked, if the company's address is changed in one location, it will not be updated elsewhere. This a serious maintenance problem that would be fatal to a system that relies heavily on component-based drafting (e.g., see specification at page 6, lines 6-12).

In the claimed invention, on the other hand, there are three concepts which are considered, including the position in the document where the component goes, the component itself that plugs in and out of the position in the document, and the particular domain model

information which plugs into the component. The novel and unobvious reconciler of the claimed invention allows a manual linking of these concepts, thereby allowing greater flexibility and greater reusability of the components because the components are more generally applicable (e.g., see specification at page 9, lines 11-18).

Thus, with the unique and unobvious features of the claimed invention, the user can reduce its database requirements, increase flexibility and reusability in that, for any given document component, the document component can be applied more generically to increase its reusability (e.g., more generically reusable). The user also can determine the linkages and leverage loose coupling of the domain knowledge and document knowledge. Further, the invention allows reconciliation to be performed interactively by the user (e.g., see specification at page 9, line 19, to page 10, line 3).

II. THE 35 U.S.C. §112 REJECTIONS

A. Claims 1, 3-16, and 25 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement.

In the Response to Arguments, the Examiner alleges that "*Applicant states that the 'ordinary skilled artisan could certainly make and use the claimed invention' with no explanation of that statement and no evidence to support that statement*" (see Office Action at pages 20-21, bridging paragraph; emphasis Applicants). Applicants respectfully disagree.

For some reason, the Examiner does not appear to have considered the arguments set forth at pages 20-21 of the Amendment under 37 C.F.R. § 1.11 filed on May 19, 2004.

For example, Applicants argued in response to the rejection under 35 U.S.C. § 112, first paragraph, that:

Applicants respectfully submit that the ordinary skilled artisan could certainly make and use the claimed invention, as defined by claims 2, 3-7, 14, 18, and 25, of a method of reconciling component variables with container variables in a document, and a system thereof, after a thorough reading of the specification with reference to the drawings, and therefore, respectfully traverses this rejection.

The Examiner states that "[t]he claim(s) contain subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention" (see Office Action at page 9). Applicants respectfully disagree.

Applicants note that, as ample case law has held, the test for enablement is whether one of ordinary skill in the art could practice (e.g., make and use) the invention (e.g., the claimed invention), without undue experimentation.

Applicants respectfully submit that a *prima facie* case has not been established by the Examiner. That is, the Examiner has not established the specific reasons why one of ordinary skill in the art could not perform the claimed method, without undue experimentation.

The specification clearly describes, with sufficient detail to enable the ordinarily skilled artisan to make and use the invention, an exemplary process of identifying variables and linking variables according to the claimed invention (**e.g., see specification at page 12, line 1, to page 17, line 10**).

> In view of the specific examples in the original disclosure and the drawings, Applicants respectfully submit that the ordinarily skilled artisan could certainly make and use the claimed invention of a method of reconciling component variables with container variables in a document, and a system thereof, after a thorough reading of the specification with reference to the drawings. In other words, one of ordinary skill in the art could practice (e.g., make and use) the invention, without undue experimentation.

(see Amendment under 37 C.F.R. § 1.11 filed on May 19, 2004, at page 20, lines 1-23, to page 21, lines 1-9).

In the Response to Arguments, the Examiner further states that "*[i]n addition to being non-enabling, the limitations are also indefinite. These conditions make it difficult for the examiner to get into the details of why the specification is non-enabling for the rejected claims. The detailed description and the claims are written in such broad sweeping language that the meaning of the claims is hard to determine. The examiner could not get into the details of why the Specification is non-enabling for the rejected claims because no details of Applicant's invention are provided in the Specification. The examiner notes that Applicant did not cite any of the Specification in support of his argument that the Specification is enabling*" (see Office Action at page 21, first full paragraph). Applicants respectfully disagree with the Examiner's position.

First, as set forth above, Applicants clearly did cite the specific page and line numbers of the specification which provides an enabling description of an exemplary aspect of the claimed invention. Particularly, the Amendment stated that "[t]he specification clearly describes, with sufficient detail to enable the ordinarily skilled artisan to make and use the invention, an

exemplary process of identifying variables and linking variables according to the claimed invention **(e.g., see specification at page 12, line 1, to page 17, line 10)**" (see Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004, at page 20, lines 11-14).

On the other hand, the Examiner states that "*[t]he Examiner made assumptions concerning the claim language for the rejected claims in order to more specifically state reasons why the rejected claims are not enabled. If the examiner is incorrect, then Applicant should fully and clearly state what the invention is and explain how the Examiner is mistaken*" (see Office Action at page 21, second full paragraph; emphasis Applicants).

However, by the Examiner's admission, the Examiner did not "*get into the details of why the Specification is non-enabling for the rejected claims because no details of Applicant's invention are provided in the Specification*" (see Office Action at page at page 21, first full paragraph). Thus, it is unclear how Applicants can "*explain how the Examiner is mistaken*" if the Examiner admittedly has not set forth or adequately explained the basis for the rejection.

Thus, Applicants respectfully reiterate that it is incumbent on the Examiner to explain *why* it doubts the truth or accuracy of any statement in a supporting disclosure and to back up assertions of its own with acceptable evidence or reasoning which is inconsistent with the contested statement (e.g., see M.P.E.P. § 2164.04; see also In re Marzocchi, 169 USPQ 367, 370 (CCPA 1971)). Moreover, the Examiner should *identify* what information is missing (e.g., that which would not allow the ordinarily skilled artisan to perform the identifying, determining, associating, identifying, and determining of claim 1) and *why* one skilled in the art could not supply the missing information without undue experimentation (e.g., see M.P.E.P. §2164.04 and §2164.06(a)).

With respect to the Examiner's position, set forth at pages 4 and 5 of the Office Action, Applicants note that the Examiner's substantive objections seem to be centered around the notion of a "link expression".

To clarify, Applicants submit that a "domain model" is a partially specified object model describing the concepts, their properties and relationships in the domain that a document is about. The values of properties may be references to other objects in the domain model.

Applicants submit that such would be very understandable by practitioners in the field (i.e., to the ordinarily skilled artisan).

On the other hand, the "link expression" defines a path in the domain model. This path ultimately lands at a domain model element.

For example, "The Company.CEO.Name" would define a path denoting the name of the CEO of "The Company".

The document model is also an object model, but different from the domain model, in that it describes the component parts of the document (e.g., the introduction, the customer information, the customers responsibilities, the deliverables, etc.).

A container variable holds a reference to a component in the document model. For example, the Customer Information Section might be a container variable. It is intended to hold a document component that describes the customer.

On the other hand, a link expression allows a container variable to be mapped to a domain model element.

Applicants note that making the mapping according to the claimed invention is an easy process. A container variable, which denotes some part of the document model, is associated

with a link expression (which denotes some object in the domain model). This can be done programmatically or through a GUI.

The mapping may assert, for example, that the Customer Information Section of the document be associated with the "thecompany.ceo" domain model element. As such, the system can then choose to render the information in the domain model element in a document model element that is a valid filler for the Customer Information Section.

Applicants emphasize that, according to an exemplary aspect of the present invention, there are three distinct structures:

1) The Domain Model describing the domain independently of any particular document structure and independently of any written description or rendering;

2) The Document Model describing the structure of a particular document. Each part ultimately represented by a container variable; and

3) Document Components, which are written and formatted language (with content variables) that can fill the container variables representing parts of a document model.

Applicants submit that "link expressions" allow you to drill down and identify elements in the domain model and link them to container variables in the document model, thereby indicating what content should be used to instantiate a document component that would fill the container variable.

Thus, according to the claimed invention, it is easy to assert the mappings. Moreover, the mappings can be overridden.

As an example, in a case where the system may instantiate a customer description document component with the CEO's personal information and insert that in the Customer Information container variable, the user (or another system) may override this and, while keeping the customer description document component, instead link it to the company's founder (e.g., "thecompany.founder").

In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

B. Claims 1, 3-16, and 18 stand rejected under 35 U.S.C. § 112, second paragraph.

In the Response to Arguments, the Examiner alleges that the text which defines the "element" and "variable" cited in the specification by Applicants are located in the "Prior Art" section of the specification. Thus, the Examiner is unsure whether the "elements" and "variables" of the present invention are the same as the "prior art" (e.g., see Office Action at page 22, lines 8-14).

Applicants note, however, that the subject references to "element" and "variable" appear in the "Description of the Related Art" section of the specification, not "prior art". That is, Applicants make no admission that the features described in the "Description of the Related Art" section of the specification are prior art to the claimed invention, as defined by 35 U.S.C. § 102.

Second, the Examiner alleges that the "domain model elements" and the "container variables" are one and the same (e.g., see Office Action at page 7, lines 11-13; see also page 22, lines 14-17).

However, as claimed by independent claim 1, "a container variable" and "an element in a domain model of the document" are separately introduced in the text of the claims and clearly

are intended to refer to separate and independent features of the claim. In other words, the claimed "element" is not being used to refer to the claimed "container variable" (i.e., "element" is not being used synonymously with the claimed "container variable"), as alleged by the Examiner.

Particularly, independent claim 1 recites a method of reconciling component variables with container variables in a document, comprising:

> identifying component variables in a component;
> for each of the component variables, determining if there is a container variable in said container that refers to a same domain concept;
> if an identification is determined, associating said component variable in the component with said container variable in the container;
> identifying a link expression of said component variable; and
> determining whether the link expression can be identified with an element in a domain model of the document.

Indeed, the specification describes that, as shown in Figure 5, when a component importation operation is initiated in an interactive reconciliation mode the system will produce mappings in connector 14 (all reference numerals herein being used for the Examiner's clarity only and not for limiting the claims) and output these to the user via a graphical user interface (GUI) 55. The user may then edit the mappings overriding the system generated mapping. Once editing of the system generated mapping is completed, component importation is continued using the edited mappings.

The present application further explains that, in an exemplary aspect, the identifying is performed interactively by the user by displaying component variables and their link expressions next to a representation of elements of the domain model. The user then makes the linking (e.g., associations) by clicking on (actuating via input device) the appropriate variable(s) in the components and matching the variable(s) to an element of the containing document's domain

model. Each variable in the component may be matched, but need not be depending upon the user's desires (e.g., see specification at page 16, lines 14-22, and page 17, lines 1-5).

Thus, along these lines, the user can select either the imported component value *or* the containing document's variable as the value which is to be used. Therefore, the variables are allowed to attach to components. Hence, by using a graphic user interface (GUI), the user identifies the associations between the component variable and a domain model element (e.g., see specification at page 17, lines 6-10).

While Applicants believe that claims 3, 5, 7, 8, 11, and 12 are clear and definite, to speed prosecution, Applicants have amended claims 3, 5, 7, 8, 11, and 12 to define more clearly the features of the present invention, thereby overcoming the Examiner's rejection under 35 U.S.C. § 112, second paragraph. Therefore, the Examiner is requested to withdraw the rejection of these claims.

With respect to claims 13 and 14, the Examiner has maintained these rejections from the previous Office Action mailed February 19, 2004. However, in the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004, these claims were amended to overcome the rejections. Thus, Applicants reiterate the request that the Examiner withdraw the rejection of these claims.

For at least the foregoing reasons, Applicants respectfully submit that claims 1, 3-16, and 18 are clear and definite. Therefore, Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. § 112, second paragraph.

III. THE PRIOR ART REJECTION

Claims 1, 3-25, and 33-35 stand rejected under U.S.C. § 102(b) as being anticipated by Boyce. For at least the following reasons, Applicants respectfully traverse this rejection.

As set forth below in detail, Applicants respectfully submit that **the Examiner has not responded to, or answered the substance of, Applicants' traversal arguments with respect to the prior art rejections**.

Applicants note that "where the Applicant traverses any rejection, the Examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it" (e.g., see M.P.E.P. § 707.07(f)).

Accordingly, Applicants respectfully request that the Examiner consider the traversal arguments set forth in the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004, and duplicated herewith, as well as Applicants additional remarks set forth below, and properly answer the substance of those traversal arguments.

For example, in the Response to Arguments, the Examiner states that "*any novel and unobvious feature of Applicant's invention must be particularly pointed out and distinctly claimed" and that "Applicant's arguments do not comply with 37 C.F.R. § 1.111(c) because they do not clearly point out the patentable novelty which he or she thinks the claims present in view of the state of the art disclosed by the references cited or the objections made*" (see Office Action at page 23, lines 7-15).

Further, the Examiner states that "*[i]nstead of broadly describing the subject matter of Claim 1 and stating that Boyce fails to disclose "all of the features of the claimed invention," Applicant should specifically point out the **exact language** of Claim 1 that does not read on Boyce*" (see Office Action at page 23, lines 15-17; emphasis original).

Moreover, the Examiner alleges that "*Applicant cannot do that, however, because Claim 1 is currently written in broad, general language and reads on Boyce*" (see Office Action at page 18-19).

Applicants respectfully disagree for several reasons.

First, Applicants respectfully submit that, contrary to the Examiner's position, Applicants have specifically pointed out the exact language of the claims that do not read on Boyce. For some reason the Examiner does not appear to have properly considered Applicants' specific examples of the claimed invention (which clearly referenced the exact language of the claims that is not disclosed or suggested by Boyce), as set forth at page 24, line 1, to page 26, line 17, of the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004. For the Examiner's convenience, Applicants reproduce such traversal arguments herewith.

For example, Applicants specifically pointed out to the Examiner and argued that:

> [I]ndependent claim 1 recites, *inter alia*:
>
> identifying component variables in a component;
> for each of the component variables, determining if there is a container variable in said container that refers to a same domain concept;
> if an identification is determined, associating said component variable in the component with said container variable in the container; and
> identifying a link expression of said component variable; and
> determining whether the link expression can be identified with an element in a domain model of the document (emphasis added).

The Examiner alleges that Boyce discloses "identifying a link expression" by displaying an "*error message*" "*when the user changes the data source and the field names of the records in the selected Access database do not match the "merge fields" in the Word document*", and thus, that Boyce "identifies" a "link expression", as claimed (see Office Action at page 16). Applicants respectfully disagree.

Applicants respectfully submit that merely displaying an *error message* clearly does not disclose or suggest "identifying a link expression of said component variable; and determining whether the link expression can be identified with an element in a domain model of the document" as claimed in claim 1.

Thus, Boyce clearly does not disclose or suggest all of the features of the claimed invention in as complete detail as recited in independent claim 1, and accordingly, the rejection of claim 1 should be withdrawn.

On the other hand, with respect to independent claim 18, the examiner similarly alleges that, by displaying "*an error message*" when the field names of the records do not match the "merge fields" in the Word document, the Boyce reference discloses the claimed "displaying a component variable next to a representation of an element in a domain model of the document", as recited in claim 18. Again, Applicants respectfully disagree.

That is, merely displaying an *error message* clearly does not disclose or suggest "displaying a component variable next to a representation of an element in a domain model of the document; identifying an association between the component variable and said element in the domain model; and matching said element of said domain model interactively by a user" as claimed in claim 18.

Thus, Boyce clearly does not disclose or suggest all of the features of the claimed invention in as complete detail as recited in independent claim 18.

Therefore, claim 18 is patentable over Boyce for this reason, as well as for somewhat similar reasons as those set forth above with respect to independent claim 1, and accordingly, the rejection of claim 18 should be withdrawn.

With respect to independent claim 17, Applicants respectfully submit that Boyce neither discloses nor suggests "automatically" reconciling component variables with container variables in a document, as claimed and described in the specification.

With respect to claim 19, Applicants respectfully submit that Boyce neither discloses nor suggests "a reconciler that maps container variables in said container, with component variables in said component", as claimed.

The Examiner alleges that the Boyce reference discloses that each "merge field" in the Word document is "mapped" to corresponding fields of each record in the Access data base. However, no where does Boyce disclose or suggest such a feature, nor does the Examiner cite any support for this feature in the Boyce reference.

Thus, Applicants respectfully submit that Boyce does not disclose or suggest all of the recitations of claim 19, and therefore, the rejection of this claim should be withdrawn.

Independent claims 33, 34, and 35 are patentable over Boyce for somewhat similar reasons as those set forth above with respect to claim 1. Claim 35 also is patentable over Boyce for somewhat similar reasons as independent claim 18.

Also, with respect to claim 33, the Examiner alleges that Boyce discloses "*the same "means" for reconciling component variables with container variable in that the method is performed by merging components of the Access database with the Word document*" (see Office Action at page 24).

However, the Office Action fails to identify any structure, equivalents thereof, or identity of function necessary for at least the claimed "means, if an identification is determined, for associating said component variable in said component with said container variable in the container" as claimed and described in the specification

(see Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004, at page 24, line 1, to page 26, line 17; emphasis original).

As the Examiner surely knows, "where the Applicant traverses any rejection, the Examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it" (e.g., see M.P.E.P. § 707.07(f)).

Accordingly, Applicants respectfully request that the Examiner consider the traversal arguments set forth in the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004, and duplicated herewith, as well as Applicants remarks set forth above, and properly answer the substance of those traversal arguments.

In view of the foregoing, Applicants respectfully submit that Boyce clearly does not disclose or suggests all of the features of the novel and unobvious combination of elements recited in claims 1-25 and 33-35. Therefore, the Examiner respectfully is requested to withdraw the rejection of these claims.

IV. REQUEST FOR REJOINDER OF NON-ELECTED CLAIMS

Applicants respectfully request that the Examiner rejoin non-elected claims 26-32, 36, and 37, which were withdrawn from consideration as being directed to non-elected species of the invention, and permit these claims to pass to allowance for somewhat similar reasons as those set forth above.

V. CONCLUSION AND FORMALITIES

A. Objections to Specification

The Office Action maintains the previous objections to the specification (see Office Action at pages 2-3). However, Applicants submit that the specification was amended by the Amendment under 37 C.F.R. § 1.11 filed on May 19, 2004, to obviate these objections (see Amendments to the Specification in the Amendment under 37 C.F.R. § 1.11 filed on May 19, 2004, at pages 2-5).

Thus, Applicants reiterates their request that the Examiner withdraw the objections to the specification.

B. Objections to Drawings

The Office Action also maintains the objection to claim 18, lines 3-4. However, Applicants respectfully submit that the claimed features are illustrated, for example, in Figures 3-5 of the present invention. Thus, Applicants respectfully request that the Examiner withdraw this objection.

The Office Action also maintains the objections to the drawings as not showing reference numerals 11 and 17 (see Office Action at page 3, lines 10-12). However, Applicants submit that the specification was amended by the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004 to remove reference numeral 17.

Moreover, with respect to reference numeral 11, Applicants specifically identified for the Examiner in the Amendment under 37 C.F.R. § 1.111 filed on May 19, 2004 that reference numeral 11 clearly is shown in the drawings, particularly, in each of Figures 1, 3, and 4.

For the foregoing reasons, Applicants respectfully reiterate their request that the Examiner withdraw the drawing objections.

In view of the foregoing, Applicant submits that claims 1 and 3-37, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: October 20, 2004

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CERTIFICATE OF TRANSMISSION

I certify that I transmitted via facsimile to (703) 872-9306 the enclosed Amendment under 37 C.F.R. § 1.116 to Examiner William D. Hutton, Jr. on October 20, 2004.

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